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8 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

2:19-CR-064-APG-NJK

10 Plaintiff,

11 v.

12 KING ISAAC UMOREN,

13 Defendant.

**United States of America's Motion to  
Approve Sale Price and Sale Terms for  
Real Property Located at 991 Feather  
Haven Court, Henderson, Nevada 89011**

14 The United States moves this Court to approve a sale of 991 Feather Haven Court,  
15 Henderson, Nevada 89011 (property)<sup>1</sup> for \$310,000.

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17 <sup>1</sup> MORE PARTICULARLY DESCRIBED AS:

PARCEL I:

18 LOT EIGHT (8) IN BLOCK TWO (2) OF AMENDED PLAT OF A PORTION OF  
19 TWO CROWS UNITS 1, 2, 3 AND 4, AS SHOWN BY MAP THEREOF ON FILE IN  
BOOK 85 OF PLATS, PAGE 23, AND AMENDED BY CERTIFICATE OF  
20 AMENDMENT RECORDED DECEMBER 1, 1998 IN BOOK 981201 OF OFFICIAL  
RECORDS AS DOCUMENT NO. 01274, AND THEREAFTER AMENDED BY  
21 CERTIFICATE OF AMENDMENT RECORDED APRIL 19, 1999 IN BOOK 990419 AS  
DOCUMENT NO. 00496, IN THE OFFICE OF THE COUNTY RECORDER OF  
22 CLARK COUNTY, NEVADA.

23 EXCEPTING THEREFROM AND GRANTING HERETO AN EASEMENT FOR  
INGRESS AND EGRESS OVER THOSE PORTIONS OF THE LOTS WITHIN SAID  
24 SUBDIVISION DELINEATED AS "PRIVATE DRIVE AND UTILITY EASEMENT"  
ON THE PLAT OF SAID SUBDIVISION.

25 PARCEL II:

26 A NON-EXCLUSIVE RIGHT AND EASEMENT OF INGRESS TO, EGRESS FROM  
AND ENJOYMENT OF THE COMMON ELEMENTS AS SHOWN IN THAT  
27 CERTAIN "DECLARATION OF PROTECTIVE COVENANTS, CONDITIONS AND  
RESTRICTIONS AND GRANT OF RESERVATION OF EASEMENTS FOR EAST  
28 HAWLEYWOOD OWNERS ASSOCIATION" RECORDED AUGUST 4, 1998 IN  
BOOK 980804 AS DOCUMENT NO. 01812, OF OFFICIAL RECORDS, CLARK

The reasons for this request are (1) to authorize Doug Sawyer to sell the property for \$310,000 under the Court-ordered interlocutory sale and Final Order of Forfeiture and (2) to stop the continued increase of (a) the delinquent Clark County real property taxes, interest, and penalties and (b) HOA fees, interest, and penalties.

This Motion is made and is based on the papers and pleadings on file herein and the attached Memorandum of Points and Authorities.

## **Motion and Memorandum of Points and Authorities**

This Court authorized the Interlocutory Sale of the property and forfeited the property in the Final Order of Forfeiture.<sup>2</sup> Mr. Sawyer listed the price for \$350,000. D&M Trust offered \$310,000 to purchase the property. If this Court does not approve the sale, the Trust will receive its earnest money deposit.

If this Court approves the sale price and sale terms, the proceeds will be accounted for and distributed in the following order: (1) unpaid real estate taxes; (2) unpaid HOA fees; (3) the broker commission at a rate of 6% of the purchase price; (4) reimbursement of Mr. Sawyer for his resale expenditures related to effecting the sale; and (5) the remaining proceeds to the government to be held in an interest-bearing account by the United States Marshals Service, which will constitute the amount to be retained by the Court as a substitute res under Supp. R. G(7)(b)(iii) and (iv).

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COUNTY, NEVADA, TOGETHER WITH ANY AND ALL IMPROVEMENTS AND APPURTENANCES THEREON. APN: 160-33-616-005.

<sup>2</sup> Order granting 46 Motion for an Interlocutory Order of Sale of 991 Feather Haven Court, ECF No. 66; Final Order of Forfeiture, ECF No. 183.

The government has determined that (1) neither the buyer nor any individual who will be on the title after the completion of the sale is a felon; and (2) this sale represents an arms-length transaction.

Dated: December 22, 2022.

JASON M. FRIERSON  
United States Attorney

/s/ Misty L. Dante  
MISTY L. DANTE  
Assistant United States Attorney

## IT IS SO ORDERED:

  
ANDREW P. GORDON  
UNITED STATES DISTRICT JUDGE